1	Michael W. Melendez Nevada Bar No. 6741	
2	COZEN O'CONNOR 101 Montgomery Street, Suite 1400	
3	San Francisco, California 94104 Phone: (415) 644-0914	
4	Fax: (415) 644-0978 Email: mmelendez@cozen.com	
5	Shauna Martin Ehlert	
6	Admitted Pro Hac Vice COZEN O'CONNOR	
7	999 Third Avenue, Suite 1900	
8	Seattle, Washington 98104 Phone: (206) 340-1000	
9	Fax: (206) 621-8783 Email: sehlert@cozen.com	
10	Designation for Service Only: Damon Schuetze	
11	Nevada Bar No. 4047 Schuetze & McGaha	
12	601 South Rancho Drive, Suite C-20 Las Vegas, NV 89106	
13	Attorneys for Plaintiff	
14	71110Theys for I turning	
15	UNITED STATES DISTRICT COURT	
16	DISTRICT OF NEVADA	
17	MEDCHOICE RISK RETENTION GROUP, INC.	Case No. 3:16-cv-00418-MMD-VPC
18	Plaintiff,	JOINT STIPULATION TO
19	V.	CONTINUE DEADLINE TO FILE PLAINTIFF'S REPLY IN SUPPORT
20	ROBERT G. RAND, M.D., and RAND FAMILY	OF ITS MOTION FOR SUMMARY JUDGMENT [DKT. 65]
21	CARE LLC	[SECOND REQUEST ¹]
22	Defendant.	
23		
24		
25		
26	The reply deadline was continued once to accommodate a stipulated continuance for Defendants' Response.	
	JOINT STIPULATION TO CONTINUE DEADLINE TO FILE PLAINTIFF'S REPLY IN SUPPORT OF ITS MOTION FOR SUMMARY JUDGMENT [DKT. 65]	

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JOINT STIPULATION

Plaintiff MedChoice Risk Retention Group, Inc. and Defendants Robert G. Rand, M.D. and Rand Family Care LLC, by and through their respective counsel, hereby stipulate as follows:

- 1. Plaintiff MedChoice filed a Motion for Summary Judgment on February 5, 2018.
- 2. On February 16, 2018, the parties stipulated to an extension of time for newly retained counsel Matthew Sharp to respond to MedChoice's motion.
- 3. That stipulation extended the response deadline from February 26, 2018 to March 19, 2018 and extended the reply deadline from March 12, 2018 to April 2, 2018.
- 4. The Court granted the stipulated continuation of deadlines, and Defendants served their response brief on March 19, 2018.
- 3. MedChoice is now requesting additional time to reply in support of its Motion for Summary Judgment to accommodate client schedules and to the intervening Easter holiday;
- 4. Therefore, the parties jointly request that the Court extend the deadline to file Plaintiffs' Reply from April 2, 2018 to **April 16, 2018**.
- 5. The parties submit that this request is not made for the purposes of delay but for purposes of judicial economy.

JOINT STIPULATION TO CONTINUE DEADLINE TO FILE PLAINTIFF'S REPLY IN SUPPORT OF ITS MOTION FOR SUMMARY JUDGMENT [DKT. 65]

CERTIFICATE OF SERVICE

I hereby certify that the above and foregoing document was served on March 28, 2018 via the Court's CM/ECF system, to all registered participants as identified on the Notice of Electronic Filing.

/s/ Shauna Martin Ehlert
Shauna Martin Ehlert

JOINT STIPULATION TO CONTINUE DEADLINE TO FILE PLAINTIFF'S REPLY IN SUPPORT OF ITS MOTION FOR SUMMARY JUDGMENT [DKT. 65]